

THE HONORABLE THOMAS S. ZILLY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

Case No. 2:20-cv-00983-TSZ

DECLARATION OF JILL CRONAUER
IN SUPPORT OF PLAINTIFFS'
RESPONSE IN SUPPORT OF CITY OF
SEATTLE'S MOTION TO SEAL CERTAIN
EXHIBITS TO THE DECLARATION OF
SHANE P. CRAMER IN RE THE CITY'S
MOTION FOR SUMMARY JUDGMENT

Noted: October 14, 2022

I, Jill Cronauer, declare as follows:

1. I am a principal and Chief Operating Officer of Hunters Capital, LLC. I have over 15 years in real estate management and leasing. I am also involved in the management of Hunters Property Holdings LLC and Greenus Building, Inc. (collectively, these entities above are referred to herein as the "Hunters Capital Entities").

2. I understand that the City has filed some materials containing the Hunters Capital

DECLARATION OF JILL CRONAUER IN SUPPORT OF
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MOTION TO SEAL CERTAIN EXHIBITS TO THE
DECLARATION OF SHANE P. CRAMER IN RE THE CITY'S
MOTION FOR SUMMARY JUDGMENT
(Case No. 2:20-cv-00983-TSZ) - 1

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1 Entities' confidential information under seal or with redactions, including an email with containing
2 leasing rate negotiations.

3 3. Redacted Exhibit 38 is an email chain between me and Grant Feek of TRED from
4 April 17, 2020 to July 24, 2020, concerning the negotiations of the terms of a new lease with
5 TRED. The redacted sections include a discussion of Hunters Capital's recourse for delinquent
6 rent amounts, lease amendment negotiations and rent abatement negotiations.

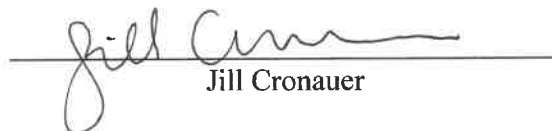
7 4. The disclosure of confidential lease terms could cause competitive harm for
8 Hunters Capital, because it could reveal Hunters Capital's strategies in dealing with lease
9 negotiations and delinquent rent, which could affect a third-party (TRED) and could also affect
10 Hunters Capitals' future business dealings relating the TRED space.

11 5. Redacted Exhibit 40 is an email exchange between Jill Cronauer of Hunters Capital
12 and Rich Fox of Poquitos, from August 27, 2020 to November 3, 2020. Redacted Exhibit 40
13 contains confidential estimations of fair market rent rates, weekly revenue figures from Poquitos
14 or October, monthly revenue figures, projected revenue, rental rates, delinquent rent amounts, and
15 lease and rent abatement negotiations.

16 6. The disclosure of confidential lease terms could cause competitive harm for
17 Hunters Capital, because it could reveal Hunters Capital's strategies in dealing with lease
18 negotiations and delinquent rent, which could affect a third-party (Poquitos) and could also affect
19 Hunters Capitals' future business dealings relating to other Capitol Hill commercial spaces.

20 I declare under the penalty of perjury under the laws of the United States of America and
21 the State of Washington that the foregoing is true and correct.

22 DATED this 10th day of October, 2022 at Seattle, Washington.

23 
24 Jill Cronauer

26 DECLARATION OF JILL CRONAUER IN SUPPORT OF
27 PLAINTIFFS' RESPONSE IN SUPPORT OF CITY OF SEATTLE'S
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